

EX PARTE OR LATE FILED

**Kathleen B. Levitz**  
Vice President-Federal Regulatory

February 18, 1999

Suite 900  
1133-21st Street, N.W.  
Washington, D.C. 20036-3351  
202 463-4113  
Fax: 202 463-4198  
Internet: levitz.kathleen@bsc.bls.com

**Ms. Magalie Roman Salas**  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

**RECEIVED**

FEB 18 1999

Re: Written Ex Parte in CC Docket No. 98-121FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Ms. Salas:

Attached is a copy of a letter dated February 17, 1999, to Kathryn Brown, Chief of Staff to Chairman Kennard, from W. N. Stacy, Operations Vice President for Interconnection Services, BellSouth Telecommunications, Inc. In that letter Mr. Stacy sets forth BellSouth's position regarding the application of the industry clearinghouse concept to the interconnection of ILEC and CLEC Operating Support Systems.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, I am filing two copies of this notice and that written ex parte presentation in CC Docket 98-121 and ask that you please place both in the record of that proceeding.

Sincerely,



Kathleen B. Levitz

Attachment

cc:	Kathryn Brown	Larry Strickling	Jordan Goldstein
	Carol Matthey	Michael Pryor	Jake Jennings
	Tom Power	Kyle Dixon	Paul Gallant
	Linda Kinney	Kevin Martin	

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BellSouth Telecommunications, Inc. 404-927-7118  
Room 4410 404-522-7010 (F)  
675 W. Peachtree Street, N.E.  
Atlanta, Georgia 30375

W. N. Stacy, P.E.  
Operations Vice President  
Interconnection

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

February 17, 1999

Mrs. Kathryn C. Brown  
Chief of Staff  
Federal Communications Commission  
The Portals  
455 12<sup>th</sup> St. S.W.  
Washington, D.C. 20554

Re: Written Ex Parte in CC Docket No. 98-121

Dear Ms. Brown:

I understand you had some questions after our meeting in Atlanta last week about BellSouth's position regarding the application of the industry clearinghouse concept to the interconnection of ILEC and CLEC Operating Support Systems (OSS). In this letter, I summarize briefly the BellSouth position, and invite you to call me with any further questions you may have.

First, let me describe what BellSouth understands the nature and function of the OSS clearinghouse concept to be. The OSS clearinghouse would be a partnership among multiple ILECs, multiple CLECs, and a systems vendor that would:

Allow the CLECs a single interface to reach all ILECs' OSS;

Reduce the costs of building and maintaining OSS for both the ILECs and CLECs; and

Develop and implement consistent national standards for order types, usage rules, data characteristics and values, editing rules and error messages.

The systems vendor would be a neutral third party upon whose selection both the ILECs and CLECs agree.

Next, let me emphasize that BellSouth fully supports the clearinghouse concept as the correct future direction for OSS interconnection in the industry. The clearinghouse will help resolve not only issues that exist today but also those that are likely to arise in the future as different wholesale network providers and multiple CLECs need to interconnect their OSS. For example:

1. Some CLECs may have business plans that focus on only one ILEC region. The clearinghouse could offer CLECs an expert partner that could enable them to deal with the complexities of OSS, and to shield them from the expenses arising from changes in the OSS caused by changing standards that their business would not need.
2. Some CLECs may have business plans that call for entry into multiple ILEC regions. In this case, the clearinghouse could become a buffer that gives the CLEC a single, consistent interface that would work with multiple ILEC OSS. Additionally, the CLEC could choose to change (or not change) its interface as different ILECs implemented new standards and features (usually at different times).
3. As national standards evolve, some features and additions would not be of interest to all CLECs. The clearinghouse would allow each CLEC to choose the set of functionality that best match its business plan, without having to always maintain parallel development with the ILEC.
4. The clearinghouse would allow the ILEC to focus on system development and testing with a limited number of trading partners (the clearinghouse vendor and large CLECs) possessing relatively sophisticated OSS support staffs. This would in turn allow more thorough testing of each new release of the OSS interfaces, thus bringing higher quality interfaces to the industry.

Finally, BellSouth does not believe that implementation of the clearinghouse is a prerequisite to 271 approval. The Telecommunications Act and the FCC's previous orders clearly state that the duty of the ILEC is to demonstrate that it is providing both itself and its competitors with access to its own OSS in "substantially the same time and manner", or "in a manner that allows an efficient competitor a meaningful opportunity to compete". Additionally, the orders have made quite clear the policy that this access must be made available, even when national standards do not yet exist.

BellSouth, as you know, has made its own proprietary interfaces available to CLECs (*e.g.*, TAFI - the Trouble Analysis Facilitation Interface) far in advance of national standards. We have done so in the belief that waiting on standards would not meet the intent of your orders.

So, while BellSouth fully and enthusiastically supports the clearinghouse as a model for industry direction, we do not believe implementation of this concept should in any way become a prerequisite for approval of a 271 application.

Please call me if you would find further clarification or explanation of these issues helpful. My telephone number is 404-927-7118.

Sincerely,

A handwritten signature in black ink, reading "W.N. Stacy". The signature is written in a cursive, flowing style with a large, stylized "S" at the end.

W.N. Stacy  
Operations Vice President  
Interconnection Services